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March 30, 2022

Via ECF

The Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Chevron Corp. v. Donziger, et al.*, 11 Civ. 0691 (S.D.N.Y.) (LAK) (RWL)

Dear Judge Lehrburger:

We represent non-parties Joshua Rizack and The Rising Group Consulting, Inc. (collectively, "Mr. Rizack"). We write to request that the Clerk of Court be ordered to release a drive it has been maintaining of Mr. Rizack's forensic images in connection with this matter.

On October 4, 2019, the Court ordered that Mr. Rizack comply with the forensic procedures outlined in a Review, Production, and Forensic Inspection Protocol (the "Protocol"). ECF 2362 (Appendix A). Paragraph 5(g) of the Protocol required that "Rizack's Expert," as defined by the Protocol, provide an unaltered copy of Mr. Rizack's forensic "Images," as defined, to the Clerk of Court, to be maintained under seal. *See id.* at p. 6. A copy of Mr. Rizack's Images was subsequently provided to the Clerk of Court in accordance with the Protocol.

By Order dated May 15, 2020, the Court ruled that Mr. Rizack had complied with his obligations under the Protocol, and that the matter as it pertains to Mr. Rizack was resolved, with Mr. Rizack's attorneys' fees and costs to be paid by Chevron Corporation, as set forth in the May 2020 Order. ECF 2495.

As it has been nearly two years since the May 2020 Order, we believe it is appropriate that Mr. Rizack's Images be returned. Accordingly, Mr. Rizack respectfully requests that the Court direct the Clerk of Court to release his Images to his counsel pursuant to the Proposed Order enclosed with this letter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Alex B. Silverman".

Alex B. Silverman